

Exhibit 15
Excerpts of the Email from
Casey McCracken to Oracle's
counsel, Re: Correspondence
re Document Custodians,
dated July 30, 2019

From: McCracken, Casey J. <CMcCracken@gibsondunn.com>
Sent: Tuesday, July 30, 2019 10:37 AM
To: Kocan, David R.; Hill, Zachary Scott; Polito, John A.; brichardson@bsfllp.com; srodriguez@bsfllp.com; ajensen@bsfllp.com; Smith, Benjamin P.; kdunn@bsfllp.com; Smith, Sharon R.; wisaacson@bsfllp.com; gschlabach@bsfllp.com; sungar@bsfllp.com; tle@bsfllp.com; khartnett@bsfllp.com; rpocker@bsfllp.com; Minne, Jacob J.O.; Lee, Lisa S.
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Subject: RE: Rimini I -- Correspondence re Document Custodians

Counsel-

Thank you for the email. Below, we respond briefly to each of the bullets you raised in your email.

- **Dev Instructions.** First, we must correct your email: Rimini's Supplemental Response to Interrogatory No. 1 did not identify Dev Instructions as a "critical element" of its PeopleSoft development processes. Second, Dev Instructions are clearly not responsive to Oracle's Supplemental RFPs 1 or 4. RFP 1 calls for documents concerning changes Rimini made in response to the injunction. The shift from technical specifications to "Dev Instructions" was not a change made in response to the Injunction. RFP 4 calls for programs developed in response to the Injunction. The Dev Instructions are not "programs," and, again, were not developed in response to the Injunction. Just as technical specifications are not responsive to either of these RFPs, neither are Dev Instructions. Third, RFP 3 calls for documents "provided" to clients, focusing primarily on client deliverables, updates provided to clients, and documentation for those updates. (See RFP 3: "All Documents Rimini provided to its customers in connection with its support of Oracle Software and Support Materials since November 5, 2018, including without limitation tax and regulatory updates, break fixes, new functionality, documentation, or any other files."). Dev Instructions are not final client deliverables, nor documentation provided to clients in the way that installation instructions or object notes are. They are much more similar to technical specifications (which Oracle knows about from *Rimini II*, but did not request until July 23, 2019). It is our understanding that some Dev Instructions are sometimes placed on client environments during development, and thus there may be some subset of Dev Instructions that would fall broadly within the letter (though, not the spirit) of RFP 3, as framed. Given the RFP's focus on client deliverables and based on Rimini's burden objections, Rimini informed Oracle through its response to RFP 3 that it would produce "the final documentation that accompanied the software updates Rimini has implemented for its PeopleSoft and JD Edwards clients since November 5, 2018," which does not include any Dev Instructions that may have been sent to client environments, assuming those could be identified.

However, on July 23, 2019, Oracle, for the first time, served a request that calls for all Dev Instructions. There is, therefore, no need for the parties to debate the scope of RFP 3 or for Rimini to parse through which Dev Instructions were sent to client environments and which were not. Rimini will produce all final Dev Instructions for updates or fixes after November 5, 2018. We are working on collecting those, and will produce them as soon as that collection and review is complete, notwithstanding that they were only recently requested.

- **Other Updates.** Rimini is continuing to work on collecting updates and fixes within its possession, custody, or control. To be clear, Rimini is not "refusing to produce documents from customer environments and cloud

systems.” As Oracle is aware, Judge Hoffman has already ruled that such materials are not within Rimini’s possession, custody, or control, and thus not within the scope of discovery. Nor did Rimini “refuse” to provide a date certain by which it will complete production—as we noted, our collection was (and still is) underway, and once that process is complete we will produce, pending any necessary review. That production is not “late”—there is no deadline for Rimini to produce these materials (other than the close of fact discovery). Nevertheless, as Rimini has repeatedly stated, Rimini is working to complete this and all other discovery as quickly as possible in light of the compressed timeframe.

- **AFW Production.** At present we still believe we will be able to produce the AFW database by August 2. Due to the size of the file, we will likely need to send it to you on a physical thumb drive. We do not yet have an update on RFP 8, which was served only a few days ago.
- **Keyword Hit Counts.** We addressed the issues related to hit counts in Ms. Tryck’s email of 4:52 p.m. yesterday.

Regards,
Casey

Casey McCracken

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